

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
Staci Lundeen, et al.

Plaintiffs,

**NOTICE OF DEFENDANTS'
MOTION TO DISMISS**

v.

Case No. 21-cv-1071 (GBD)

Krucial Staffing, LLC, et al.

Defendants.

-----X

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law and Declarations, Defendants Krucial Staffing, LLC and Brian Cleary, will move this Court before the Honorable George B. Daniels, U.S.D.J., at the United States District Court for the Southern District of New York, located at 500 Pearl St., New York, NY 10007-1312, on a date and time to be determined by the Court, for an Order pursuant to Federal Rule of Civil Procedure 12(b)(2) dismissing the above-captioned suit for lack of personal jurisdiction and, alternatively, pursuant to Federal Rule of Civil Procedure 12(b)(6) for failure to state a claim, and awarding Defendants such other and further relief as this Court deems just, proper, and equitable.

Respectfully submitted,

LATHROP GPM LLP

By: s/ Nancy Sher Cohen

Nancy Sher Cohen (NY Bar No. 4160479)

1888 Century Park East, Suite 1000

Los Angeles, California 90067

Telephone: (310) 789-4600

Facsimile: (310) 789-4601

Nancy.Cohen@LathropGPM.com

and

Michael J. Abrams (*pro hac vice* pending)
Kate O'Hara Gasper (*pro hac vice* pending)
2345 Grand Boulevard, Suite 2200
Kansas City, Missouri 64108-2618
Telephone: (816) 292-2000
Telecopier: (816) 292-2001
Michael.Abrams@LathropGPM.com
Kate.Gasper@LathropGPM.com

ATTORNEYS FOR DEFENDANTS